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Attorneys for ASPLUNDH CONSTRUCTION, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**ASPLUNDH CONSTRUCTION, LLC'S
STATEMENT OF NON-OPPOSITION
AND RESERVATION OF RIGHTS RE
REORGANIZED DEBTORS'
EIGHTEENTH OMNIBUS
OBJECTION TO CLAIMS**

Date: November 17, 2020

Time: 10:00 a.m.

Place: (Telephonic Appearance Only)
450 Golden Gate Avenue
Courtroom 17, 16th Floor
San Francisco, CA 94102

Related Docket No. 9263

Asplundh Construction, LLC ("Asplundh") submits this statement of non-opposition and reservation of rights in response to the Reorganized Debtors' Eighteenth Omnibus Objection to Claims (Amended and Superseded Claims) [Doc# 9263] ("18th Omnibus Objection"), and submits as follows:

1 Asplundh does not object to disallowance of Asplundh's Claim #7976 in the amount of
2 \$3,013,616.14, as set forth in the 18th Omnibus Objection, based upon the Debtors' representation
3 that Asplundh's Claim #17001 in the amount of \$4,170,913.06, referred to by the Debtors as the
4 "Surviving Claim," is in no way impacted or affected by the 18th Omnibus Objection.¹ Asplundh
5 expressly reserves any and all rights with respect to Claim #17001, as well as any other claim that
6 Asplundh has filed in these cases that is not referenced in the 18th Omnibus Objection.

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8 Dated: October 27, 2020

DUANE MORRIS LLP

9 By: /s/ Geoffrey A. Heaton (206990)

10 GEOFFREY A. HEATON
11 Attorneys for ASPLUNDH
12 CONSTRUCTION, LLC
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28 ¹ As set forth on the face sheet of Claim #17001, Claim #17001 amended Claim #7976.